| 1 | AMERICAN CIVIL LIBERTIES UNION FOUNDATION OF NORTHERN CALIFORNIA | ACLU FOUNDATION IMMIGRANTS' RIGHTS PROJECT |
|----|---|---|
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| 6 | COOLEY LLP | FOUNDATION CHRISTOPHER DUNN |
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| 11 | acorkery@cooley.com eslovak@cooley.com | jperry@nyclu.org |
| 12 | • | |
| 13 | LAW OFFICES OF HOLLY S. COOPER HOLLY S. COOPER (SBN 197626) | |
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| 16 | Attorneys for Plaintiff | |
| 17 | | |
| 18 | | |
| 19 | UNITED STATES DISTRICT COURT | |
| 20 | NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION | |
| | H G | G N 2.15 02615 NG |
| 21 | Ilsa Saravia, as next friend for A.H., a minor, and on behalf of herself individually | Case No. 3:17-cv-03615-VC |
| 22 | and others similarly situated, | Honorable Vince Chhabria |
| 23 | Plaintiff, | STIPULATION TO SET A SHORTENED |
| 24 | v. | BRIEFING SCHEDULE AND HEARING ON PLAINTIFF'S MOTION FOR PRELIMINARY |
| 25 | William Barr, Attorney General, et al., | APPROVAL OF CLASS SETTLEMENT |
| 26 | Defendants. | |
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WHEREAS, the Parties have reached a settlement in the above-captioned action;

WHEREAS, Plaintiff intends to file a Motion for Preliminary Approval of Class Settlement no later than September 18, 2020;

WHEREAS, Defendants do not intend to oppose Plaintiff's Motion for Preliminary Approval;

WHEREAS, The Court's Calendar reflects that October 15, 2020 is currently available for Civil Law and Motion hearings;

WHEREAS, the parties agree that it would be most efficient to shorten the standard 35-day briefing schedule per L-R 7-2 and for the Court to hold a preliminary approval hearing on October 15, 2020;

WHEREAS, counsel for Plaintiff has an existing obligation scheduled for October 22, 2020,

NOW, THEREFORE, the parties respectfully request that the Court set the briefing schedule and hearing date as follows:

- September 18, 2020: Plaintiff to file Unopposed Motion for Preliminary Approval of Class Settlement;
- September 25, 2020: Defendants to file Notice of Non-Opposition;
- October 15, 2020 (or as early as the Court allows): Preliminary Approval hearing on Plaintiff's Motion.

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| 1 | Dated: September 17, 2020 | COOLEY LLP |
|----------|---------------------------|---|
| 2 | - | /s/ Martin S. Schenker |
| 3 | | Martin S. Schenker Ashley K. Corkery Evan G. Slovak |
| 4 | | American Civil Liberties Union Foundation of |
| 5 6 | | Northern California William S. Freeman Sean Riordan |
| 7 | | |
| 8 | | ACLU Foundation Immigrants' Rights Project Stephen B. Kang |
| 9 | | Law Offices of Holly S. Cooper Holly Cooper |
| 10 11 | | New York Civil Liberties Union Foundation Christopher Dunn |
| 12 | | Amy Belsher Jessica Perry |
| 13 | | Attorneys for Plaintiff |
| 14 | | |
| 15 | Dated: September 17, 2020 | UNITED STATES DEPARTMENT OF JUSTICE |
| 16 | | |
| 17 | | /s/ Nicole M. Murley |
| 18 | | Nicole M. Murley Sarah B. Fabian |
| 19 | | Attorneys for Defendants |
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ATTESTATION I hereby attest that concurrence in the filing of this document has been obtained from the Signatory of this document, pursuant to L.R. 5-1(i)(3). /s/ Martin S. Schenker Martin S. Schenker STIP. TO SHORTEN BRIEFING SCHEDULE